

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

versus

JERREMY JAMES JENKINS

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CRIMINAL NO. 4:23CR358-6

DEFENDANT’S MOTION TO SET BOND

TO THE HONORABLE JUDGE LEE H. ROSENTHAL:

COMES NOW Jeremy James Jenkins, by and through his attorney of record, and hereby requests this honorable Court consider the merits of this motion and in turn grant this motion based upon the following:

Mr. Jenkins has been charged in a multi-count indictment of being part of a conspiracy to interfere with commerce by robbery, conspiracy to possess with intent to distribute a controlled substance, attempt to possess with intent to distribute a controlled substance, and possession of a firearm in furtherance of a drug trafficking crime. Mr. Jenkins was released originally on August 28, 2023, on a \$50,000 unsecured bond. Mr. Jenkins was arrested on January 29, 2024, based on a pretrial violation. A hearing was held on February 8, 2024, regarding the violation and Mr. Jenkins was released with additional conditions.

The Government filed a motion to revoke bonds based on alleged violations of his release and a hearing was held before Magistrate Judge Andrew Edison on October 1, 2024. Judge Edison issued an order of detention pending trial citing 18 U.S.C. 3148(b)(2)(B) that Mr. Jenkins would not abide by any conditions or combinations of conditions of release.

Since the time of Mr. Jenkins’ detention, there exists information that was not known to Mr. Jenkins at the time of the hearing and that has a material bearing on the issue whether there are

conditions or a combination of conditions for Mr. Jenkins to comply with. Mr. Jenkins has been offered employment with ATC Plastics located at 1235 Kress St., Houston, TX 77020 to begin immediately upon his release. (see attached). Further, it was learned that Mr. Jenkins' grandmother has been diagnosed with serious medical issues including possible breast cancer and kidney failure. (Filed separately under seal).

WHEREFORE, PREMISES CONSIDERED Defendant requests this Court consider the merits of this motion and, in turn, grant the same based upon the foregoing.

Respectfully submitted,

/s/ Raymundo J. Vazquez

Raymundo J. Vazquez

State Bar of Texas: 24094996

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Attorney for Defendant

CERTIFICATE OF SERVICE

I, Raymundo J. Vazquez, certify that a true and correct copy was delivered to the Government and current counsel via email on December 13, 2024.

/s/ Raymundo J. Vazquez

Raymundo J. Vazquez

CERTIFICATE OF CONFERENCE

I, Raymundo J. Vazquez, have conferred with counsel for the Government and the Government is OPPOSED to this motion.

/s/ Raymundo J. Vazquez
Raymundo J. Vazquez

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ORDER ON DEFENDANT'S MOTION TO SET BOND

The Court having considered the Motion hereby Orders:

_____ The motion is Granted: Bond will be set at _____

_____ A hearing on this motion will be held on _____ at _____ am/pm.

Lee H. Rosenthal
United States District Court Judge